UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

BRIAN CLARK, Individually and On)
Behalf of All Others Similarly Situated,) Civ. Action No. 04-10454 DPW
Plaintiff,)
)
v.)
)
SONUS NETWORKS, INC., PAUL R.)
JONES, EDWARD N. HARRIS, J.)
MICHAEL O'HARA, HASSAN AHMED,)
PH.D. AND STEPHEN NILL,)
)
Defendants.)
	_)

SCHEDULING STIPULATION

WHEREAS, on February 12, 2004, plaintiff Brian Clark filed Brian Clark, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc, Paul R. Jones, Edward N. Harris, J. Michael Ohara, Hassan M. Ahmed and Stephen J. Nill, Civil Action No. 04-10454, DPW (D. Mass.) (the "Clark" Complaint"), a putative class action complaint alleging securities fraud under the Exchange Act; and

WHEREAS, Plaintiff intends to file a motion to consolidate the Clark Complaint with all other existing similar actions and later-filed similar actions, and pursuant to the Private Securities Litigation Reform Act of 1995 (the "Reform Act"), intends to move for the appointment of a Lead Plaintiff and approval of the retention of Lead Plaintiff's counsel;

¹ A current list of these existing and later-filed similar actions is attached as Exhibit A hereto.

that:

THEREFORE IT IS HEREBY STIPULATED AND AGREED by the parties

- Service of the Clark Complaint is accepted by each of the undersigned defendants, as of the date hereof or the date of personal service upon the defendants whichever is earlier;
- 2. Defendants need not respond to the Clark Complaint, but shall respond to an Amended Consolidated Complaint no later than 45 days after such Amended Consolidated Complaint is served upon Defendants by the Lead Plaintiff, to be appointed by the Court in order to consolidate the Clark Complaint with all other existing similar actions and later-filed similar actions in accordance with Section 21D(a)(3) of the Securities Exchange Act of 1934. In the event that the Motion to Consolidate is denied, Defendants shall respond to the Clark Complaint no later than 45 days after such denial;
- 3. In the event that any deadline herein falls on a weekend or holiday, that deadline shall be extended to following business day; and

4. After appointment of a Lead Plaintiff pursuant to the Reform Act, service on lead counsel for such plaintiff shall satisfy Defendants' service obligations.

BRIAN CLARK, Individually and On Behalf of All Others Similarly Situated,

By his attorneys,

Andrew M. Schatz

Jeffrey S. Novel

Justin S. Kudler (BBO# 644824)

Nancy A. Kulesa

Schatz & Nobel, P.C.

330 Main Street, 2nd floor

Hartford Connecticut 06016

860-493-6292

M. Clay Ragsdale

Ragsdale & Frese LLC

The Farley Building, Suite 550

1929 Third Avenue North

Birmingham, AL 35203

205-251-4775

SONUS NETWORKS, INC.

By their attorneys,

Jeffrey B. Rudman (BBØ# 433380)

James W. Prendergast (BBO# 553073)

Daniel W. Halston (BBO# 548692)

Hale and Dorr LLP

60 State Street

Boston, MA 02109

(617) 526-6000

PAUL R. JONES

Document 2

By his attorney,

aten Horaka (TWY) John Hughes (BB**Ø**# 243660)

Edwards & Angell, LLP

101 Federal St.

Boston, MA 02110

617-439-4444

EDWARD N. HARRIS

By his attorney,

nghod INP) John Hughes (BBO#243660)

Edwards & Angell, LLP

101 Federal St.

Boston, MA 02110

617-439-4444

J. MICHAEL O'HARA

By his attorney,

John Hughes (BBO# 243660)

(hughes (TWP)

Ædwards & Angell, LLP

101 Federal St.

Boston, MA 02110

617-439-4444

HASSAN AHMED, PH.D.

By his attorneys,

Robert S. Frank Jr. (BBO# 177240)

pent Frank LIM

John R. Baraniak Jr. (BBO# 552259)

Choate Hall & Stewart

Exchange Place Building

53 State Street

Boston, MA 02109-2891

(617) 617-248-5000

STEPHEN J. NILL

By his attorneys,

onte Matale (Inf) Thomas J. Dougherty (BBO# 132300) Matthew J. Matule (BBO# 632075)

Skadden, Arps, Slate, Meagher & Flom LLP

One Beacon Street

Boston, MA 02108-3194

(617) 573-4800

Dated: March 18, 2004

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for egen other party

EXHIBIT A

- Deborah Chin, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan Ahmed, PH.D., Stephen Nill, C.A. No. 04-10294, DPW (D. Mass.)
- 2. <u>Richard Curtis, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan Ahmed, PH.D., and Stephen Nill, C.A. No. 04-10314, MLW (D. Mass.)</u>
- 3. <u>Samantha Den, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan H. Ahmed, Stephen J. Nill,</u> C.A. No. 04-10310, DPW (D. Mass.)
- 4. <u>Peter Kaltman, On Behalf of Himself and All Others Similarly Situated v. Sonus</u>
 <u>Networks, Inc., Ruben Gruber, Hassan Ahmed and Stephen Nill,</u> C.A. No. 04-10309,
 DPW (D. Mass.)
- 5. <u>Information Dynamics, LLC, On Behalf of Itself and All Others Similarly Situated v. Sonus Networks, Inc., Paul R. Jones, Edward N. Harris, J. Michael O'Hara, Hassan M. Ahmed and Stephen J. Nill, CA. No. 04-10308, DPW (D. Mass.)</u>
- 6. <u>Michelle Trebitsch, On Behalf Of Herself and All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. 04-10307, DPW (D. Mass.)</u>
- 7. <u>Steve L. Baker, Individually and On Behalf of All Others Similarly Situated v. Sonus</u> Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. 04-10332, DPW (D. Mass.)
- 8. <u>Haiming Hu, Individually and On Behalf Of All Others Similarly Situated v. Sonus</u> Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10346, DPW (D. Mass.)
- 9. <u>Samuel Ho, Individually and On Behalf Of All Others Similarly Situated v. Sonus</u>
 <u>Networks, Inc, Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10363, DPW (D. Mass.)</u>
- 10. Ronald Kassover, On Behalf of The Ronald Kassover IRA and All Others Similarly
 Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10329,
 DPW (D. Mass.)
- 11. <u>Michael Kaffee, Individually and On Behalf of All Others Similarly Situated v. Sonus Networks, Inc.</u>, Hassan M. Ahmed, Stephen J. Nill, C.A. 04-10345, DPW (D. Mass.)

- Wheaton Electrical Services Retirement 401K Profit Sharing Plan, On Behalf of Itself 12. and All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10383, DPW (D. Mass.)
- Charles Starbuck, Individually and On Behalf of All Others Similarly Situated v. Sonus 13. Networks, Inc., Hassan Ahmed, PH.D., Stephen Nill, C.A. No. 04-10362, DPW (D. Mass.)
- Robert Conte and Mark Respler, Themselves and On Behalf of All Others Similarly 14. Situated v. Sonus, Hassan Ahmed, PH.D., Stephen Nill, C.A. No. 04-10382, DPW (D. Mass.)
- 15. Jeffrey C. Rodrigues, Individually and on Behalf of All Others Similarly Situated v. Sonus Networks, Inc., Hassan M. Ahmed, Stephen J. Nill, C.A. No. 04-10364, DPW (D. Mass.)
- Brian Clark, Individually and on Behalf of All Others Similarly Situated v. Sonus 16. Networks, Inc., Paul R. Jones, J. Michael O'Hara, Hassan M. Ahmed and Stephen J. Nill, C.A. No. 04-10454, DPW (D. Mass.)